

Having recently retired after 42 years in the broadcast and advertising business in Los Angeles I would like to include my voice in those objecting expanding the number of television and radio stations broadcasters can own. The only justification for such an expansion is to increase, at the public's expense, the profitability of the existing network and major broadcast organizations. Since the change in 1996 there has been an increasing lack of competition and diversity in Los Angeles market. This is after all the test case. Viacom owns and operates the CBS O&O and the UPN outlet. Disney operates the ABC O&O and Channel 9 (KTTV). And the LA Times now owns KTLA. Viacom loads their TV outlets with cross promotions for the several radio stations so that none of the increased commercial minutes go unfilled. This diminishes the effectiveness of the paid advertisers message in addition to the clutter. If the rule is changed this ugly practice will only increase. As for serving the public interest one only has to review the programming logs of any of these stations to understand the limited pool of existing material for the stations to air. Re runs, infomercials and any other kind of cheap programming is the rule. The current ownership rule has produced a bottom line mentality that produces much of the cheaply produced pandering programming that dominates broadcast. I am old enough, and been a part of the business long enough, to recall when local radio stations were precisely that, programmed for a local audience, after all the traffic signal was developed by LA radio station, KMPC, when it was a part of Golden West owned and operated by Gene Autry. Autry operated a small number of great local stations in the major west coast markets. Local stations that served the communities with a voice of and for the community. KMPC had a sales force that was interested in selling KMPC, today Viacom sends its radio salesmen into the market representing a specific station (for cover I believe) but if an advertiser isn't interested in that particular station, sell them another Viacom format before someone else gets the dollars. The market is all ready a mess and this proposed rule change will insure that the mess continues. Finally, from a competitive standpoint this proposal is ridiculous. How is an advertiser better served by having 7 TV stations represented by 5 companies as opposed to 7. That is real fuzzy math. Perhaps it would be best if the Commissioners had to spend some time in the real world of broadcast negotiations from the advertiser or ad agency standpoint before they vote to enrich the existing broadcasters. Can anyone actually believe that the public is better served by a diverse media company like Viacom owning CBS as opposed to the time when stations ownership was limited and CBS was a stand alone broadcaster, come now that simply defies reality. Anyway thanks for listening.